RESPONSE AND REMARKS

Claim Rejections Under 35 U.S.C. §103(a)

The Office Action rejected Claims 1, 3, 4 and 6 under 35 U.S.C. § 103(a) as being unpatentable over Nicholls et al. (U.S. Patent No. 5,631,827; "*Nicholls*") in view of in view of Boucher et al. (U.S. Patent No. 6,976,007 "*Boucher*"). *Office Action*, Topic No. 3, p. 2.

Claim 2 was rejected in the Office Action as being unpatentable over *Nicholls* and *Boucher* as stated for Claim 1, and further in view of Kara et al. (U.S. Patent No. 6,233,568; "*Kara*"), and Thiel (U.S. Patent No. 5,699,258; "*Thiel*"). *Office Action*, Topic No. 8, p. 3.

The Office Action rejected Claims 7, 9, and 31 under 35 U.S.C. § 103(a) as being unpatentable over *Nicholls* in view of *Kara*, and Intershipper (a *Newsbytes* Article dated February 18, 1998 (the "*Intershipper Newsbytes Article*" or "*Intershipper*"). *Office Action*, Topic No. 12, p. 5.

The Office Action rejected Claim 10 under 35 U.S.C. § 103(a) as being unpatentable over *Nicholls*, *Kara*, and *Intershipper* as applied to Claim 9, and further in view of *Boucher*. *Office Action*, Topic No. 16, p. 6.

Response Remarks Regarding the Claim Rejections under Section 103(a)

The rejections under Section 103(a) have been carefully considered. The Claims of the present application have been amended to more distinctly recite the claimed invention.

It is respectfully asserted, for the reasons given and the authorities cited below, that none of the references of record, even when considered in combination, disclose, anticipate, teach or suggest all of the limitations of the Claims of the present application, as amended.

Claims 1, 2, 3, 4, 6 and 10

For the reasons given and authorities cited below, it is respectfully asserted that none of the cited references, whether considered alone or in combination, disclose, anticipate, teach or suggest the functional alignment of server computers as claimed in one way or another by independent Claims 1 and 6 and by dependent Claim 10. Further, it is respectfully asserted, for the reasons given and authorities cited below, that the limitations of independent Claims 1 and 6, and dependent Claim 10, are further distinguished from the references of record.

In rejecting independent Claims 1 and 6, the Office Action stated that "Nicholls discloses the use of multiple servers performing specific functions (See Figure 2) but fails to disclose the use of a server used for tracking." *Office Action*, Topic No. 5, p. 3. In order to compensate for the failure of *Nicholls* stated by the Office Action of using a server for tracking, the Office Action stated that "Boucher discloses the use of a multi-carrier package tracking system, with a tracking server (22), which upon receipt of a user tracking request (191) through Instatrac (89), communicates with carrier servers to store tracking information and display to the user (See Column 4, lines 48-65 and Column 8, lines 10-22)." *Office Action*, Topic No. 5, p. 3. The Office Action then asserts that "[i]t would have been obvious ... to modify Nichols with the tracking server in the multi-carrier tracking system of Boucher, in order to provide a tracking service to a user...." *Office Action*, Topic No. 5, p. 3 (citing *Boucher*, abstract and column 3).

Although *Boucher* may disclose a way for a user to "... obtain prioritized tracking information from the associated carrier tracking website" (*Boucher*, abstract), for the reasons given and the authorities cited below, it is respectfully asserted that the limitations claimed by, for example, Claim 1 of the present application, are distinguished from the tracking system disclosed by *Boucher*.

As a first distinguishing feature of the claimed limitations, Claim 1 expressly recites "at least a third server computer device of the plurality of functionally aligned server computer devices that is programmed to perform ... providing tracking information." Further, it is respectfully asserted that Claim 1,

for example, expressly recites that another server computer, namely, "... at least a second server computer device of the plurality of functionally aligned server computer devices that is programmed to perform ... rating each respective request by each respective user of the plurality of users to ship a respective parcel ...."

As compared to the claimed third server computer device recited by, for example, Claim 1, it is respectfully submitted that *Boucher* discloses that "... the tracking objects are created and their creation and transfer controlled by a tracking coordinator forming part of the shipping system's server." *Boucher*, col. 1, lines 54-57; *see also, e.g., Boucher*, col. 3, lines 7-11 ("This shipping server operates so as to generate a tracking object which is a component object model (COM) created by the InstaTrac component 89."). As compared to the claimed third server computer device recited by, for example, Claim 1, it is respectfully asserted that the quoted portions of *Boucher* expressly state that *Boucher* uses the same server as the "shipping server" and for tracking.

It is respectfully asserted that *Boucher* does not disclose functional alignment of a plurality of server computer devices so that one of its server computers performs tracking. Rather, as previously asserted above, *Boucher* discloses using the "shipping server" for tracking as well. As explained in the Specification of the present application, using a single server device, such as is disclosed, for example, in *Boucher*, to perform all shipping functions may be less effective for supporting a high volume of shipping input and requests:

> Some standalone carrier systems dedicate a single computer device to the performance of all shipping functionalities. Such a configuration does not provide time effective support for a high volume of shipping input and requests by a high volume of users over a global communications network. Accordingly, some way is needed to provide time effective support for a high volume of shipping input and requests by a high volume of users over a global communications network.

Specification, p. 2, lines 19-24.

As a further distinction, it is respectfully submitted that independent Claims 1 and 6 of the present application do not merely recite a tracking system for

tracking packages. Nor do independent Claims 1 and 6 merely recite a server computer programmed for providing tracking information. Rather, independent Claim 1 of the present application expressly recites "...access[ing] a respective carrier system associated with the carrier, and obtain[ing] from the respective carrier system, shipment status information for the respective parcel according to the identifier ..."; independent Claim 6 expressly recites "... accessing a respective carrier computer system of a plurality of carrier computer systems over the communications network ... and ... obtaining carrier tracking information corresponding to the tracking number from the respective carrier computer system ...." Similarly, Claim 10, dependent on independent Claim 9, recites "... access a respective carrier system and ... obtain respective carrier tracking information from the respective carrier system regarding a respective shipping status corresponding to the respective identifier and ... display the respective carrier tracking information to the respective display device in communication with a respective client computer device used by the respective user."

For the reasons explained further below, it is respectfully asserted that the claimed limitation of "accessing a ... carrier ... system" as claimed in one way or another by Claims 1 and 6 (and dependent Claim 10) to obtain tracking information is distinguished from the disclosure of Boucher. In particular, Boucher discloses "... sending tracking object[s to] the designated carrier tracking website." Boucher, col. 3, lines 14-15. Boucher discloses that "[t]he tracking objects ... are conveyed to the corresponding carrier tracking website 130 via the Internet 24 ... The carrier tracking website 130 then processes each tracking request from the tracking object and generates a tracking response which is conveyed as an HTML page 131 ... and is transferred via the Internet 24 to the tracking component 88." Boucher, col. 4, lines 10-17.

As compared to sending a tracking request to a carrier tracking website as disclosed in Boucher, it is respectfully asserted that various exemplary shipping system embodiments of the elements recited by amended Claims 1 and 6 of the present application would respond to a user's request for tracking information for a parcel by *accessing* the relevant carrier system and *obtaining* shipment status

information from that relevant carrier system. For example, independent Claim 1 recites:

> wherein the third server computer device is programmed to:
> receive a respective request from a respective user of the plurality of users for a shipment status of a respective parcel, wherein the respective request comprises an identifier of the respective parcel.
> determine a carrier associated with the identifier,
> *access* a respective carrier system associated with the carrier, and
> obtain from the respective carrier system, shipment status information for the respective parcel according to the identifier.

(Emphasis added).

Similarly, independent Claim 6 recites:

> ... wherein the second server computer is further programmed to respond to the respective input of the respective tracking number by determining a carrier associated with the respective tracking number, wherein the second server computer is further programmed to further respond to the respective input of the respective tracking number by *accessing* a respective carrier computer system of a plurality of carrier computer systems over the communications network, wherein the respective carrier computer system is associated with the tracking number, and by obtaining carrier tracking information corresponding to the tracking number from the respective carrier computer system, ...

(Emphasis added).

Similarly, dependent Claim 10 recites:

> programming at least a fourth server computer device of the plurality of functionally aligned server computer devices to access a respective carrier system and to obtain respective carrier tracking information from the respective carrier system regarding a respective shipping status corresponding to the respective identifier and to display the respective carrier tracking information to the respective display device in communication with a respective client computer device used by the respective user.

It is respectfully submitted that the Specification of the present application describes various non-limiting exemplary embodiments of the above-recited

limitations of independent Claims 1 and 6, and dependent Claim 10. For example, the Specification discloses that:

> As depicted in FIG. 5, using the Carrier's Internet URL, the System 1 (labeled "iShip.com" in FIG. 5) then makes an HTTP (HyperText Transfer Protocol) connection over the Internet 15 to the Carrier's web server, e.g., 23-2, 24-2, 25-2, 26-2, or 27-2, using the URL information for the particular Carrier's web server.

Specification, p. 16, line 28 – p. 17, line 2. The Specification of the present application describes in some detail, for various non-limiting exemplary embodiments, an exemplary way that carrier systems would be accessed and tracking information obtained:

> ... using the Carrier's Internet URL, the System then makes an HTTP connection to the Carrier's web server, e.g., 23-2, 24-2, 25-2, 26-2, or 27-2, using the URL information for the particular Carrier's web server. Depending upon the Carrier, the System's 1 request and report interface with the Carrier's web server is programmed in HyperText Markup Language ("HTML") (e.g., 24-1, 25-1, 27-1), Extensible Markup Language ("XML") (e.g., 26-1), or both HTML and XML (e.g., 23-1). FIG. 66 depicts an exemplary XML formatted request for submitting a tracking request to a Carrier. FIG. 67 depicts an exemplary successful tracking response, also in XML format, returned by the Carrier.
>
> Then, as depicted in FIG. 69, the System transmits the Carrier's tracking number over the HTTP connection (2052 or 2054). The System instructs the Carrier's web server as to what information is requested based on the connection made using the URL.
>
> If the Carrier's web server successfully responds 2055 to the System's 1 tracking request, the System disconnects from the Carrier's web server and parses the response data. Some Carriers' response data contains unnecessary text information. The System strips out all of the unnecessary text in order to parse the relevant information.

Specification, p. 85, line 23 – p. 86, line 11.

It is respectfully asserted that the above-recited limitation of accessing the respective carrier system is completely absent from *Boucher*.

It is respectfully submitted that, "... when evaluating the scope of a claim, every limitation in the claim must be considered. USPTO personnel may not dissect a claimed invention into discrete elements and then evaluate the

elements in isolation. Instead, the claim as a whole must be considered." *Interim Guidelines for Examination of Patent Applications for Patent Subject Matter Eligibility*, (United States Patent and Trademark Office; *Official Gazette* Notices for November 22, 2005), § II.C (*citing Diamond v. Diehr*, 450 U.S. 175, 188-89, 209 USPQ 1, 9 (1981) ("It is inappropriate to dissect the claims into old and new elements and then to ignore the presence of the old elements in the analysis. This is particularly true in a process claim because a new combination of steps in a process may be patentable even though all the constituents of the combination were well known and in common use before the combination was made.")).

In view of the direction by the *Interim Guidelines* to consider every limitation of a claim and to consider a claim as a whole, it is respectfully asserted that, when all of the elements of amended Claims 1 and 6, and dependent Claim 10, are considered together, there is no teaching or suggestion found in any of the references of record of the combination of limitations as recited in amended independent Claims 1 and 6, and dependent Claim 10, of the present application to respond to a user's request to track a parcel by accessing the relevant carrier system and obtaining from that relevant carrier system, tracking information for the parcel.

Accordingly, it is respectfully asserted that amended independent Claims 1 and 6, and therefore the Claims that are dependent on them (namely, Claims 2-4), and dependent Claim 10, are distinguished from the references of record and are in condition for allowance.

Dependent Claim 2

For the reasons given and authorities cited above with respect to independent Claim 1 on which Claim 2 depends, it is respectfully asserted that none of the cited references, whether considered alone or in combination, disclose, anticipate, teach or suggest all of the limitations recited by independent Claim 1. Accordingly, it is respectfully asserted that Claim 2 is in condition for allowance.

Further, for the reasons given below with respect to the limitations recited by dependent Claim 2, it is respectfully asserted that Claim 2 is further distinguished from the cited references and is in condition for allowance.

The Office Action states, regarding dependent Claim 2, that "the generating of the simultaneous cross-comparison display has not been positively claimed as being displayed, but simple 'for display'. As stated above, the examiner considers this to be intended use limitation and not positively claimed." *Office Action*, Topic No. 19, p. 7; see also, *Office Action*, Topic No. 11, p. 4.

Contrary to the rejection, it is respectfully asserted that Claim 2 expressly recites the limitation to "... generate a respective simultaneous cross-comparison display of respective shipping rates for each delivery service offered by each carrier of the plurality of carriers that would ship the respective parcel ...."

In rejecting Claim 2 as obvious, the Office Action asserts the combination of *Nicholls* and *Boucher* as used for rejecting Claim 1, with *Kara* and *Thiel*. *Office Action*, Topic No. 8, p. 3.

It is respectfully asserted, for the reasons given below, that the citation to the table of *Thiel* cited in the Office Action (at *Thiel*, col. 11, lines 1-13 (the "*Thiel Table*")) as support for the assertion by the Office Action that "Thiel discloses ... generating a simultaneous display of rates for each carrier, that includes rates for different services (Column 11, lines 1-13) ..." (*Office Action*, Topic No. 10, p. 4), does not support the assertion of obviousness of the limitations of Claim 2 to "... generate a respective simultaneous cross-comparison display of respective shipping rates for each delivery service offered by each carrier of the plurality of carriers that would ship the respective parcel ...."

In comparing the cited *Thiel Table* to both the features attributed to it in the Office Action, and more importantly, to the claimed limitations of Claim 2, it is respectfully asserted that the contents of the cited *Thiel Table* and the description by *Thiel* of the use of the cited *Thiel Table* as described by *Thiel* are instructive.

At first glance, the cited *Thiel Table* may appear to provide a stored shipping rate comparison. However, it is respectfully submitted that under close inspection, the cited *Thiel Table* provides a stored comparison of base rate

components, not of shipping rates that have been calculated, for example, as claimed by Claim 1, for "... each respective request by each respective user of the plurality of users to ship a respective parcel ...."

As compared to storing rates for delivering a particular parcel, the cited *Thiel Table* is shown as containing shipping feature entries for five (5) different carriers. *See Thiel*, col. 11, lines 1-13. For each of the five (5) different carriers (Carrier 1-5), the cited *Thiel Table* shows a shipping feature entry for each of the following shipping features: Destination Zone, Base Charge, Express Delivery, Added [Express Delivery] Charge, Return Receipt, Added [Return Receipt] Charge, Discount for greater than 100 items, Discount for greater than 1000 items, and Discount for greater than 10000 items. *Id.* at col. 11, lines 1-13.

As compared to generating a simultaneous cross-comparison of rates for delivering a respective particular parcel for each delivery service of a plurality of delivery services offered by each identified carrier (as is claimed by, for example, Claim 2), it is respectfully submitted that *Thiel* describes the cited *Thiel Table* as a *stored* table of services and fee *components* of various carriers. Further, *Thiel* explains that the cited stored *Thiel Table* is used by the *Thiel* system to "... search[] the carriers which offer the desired services ..." (*Thiel*, col. 11, lines 22-23) and "... [perform] a fee optimization ... to reach the best price ..." (*Thiel*, col. 11, lines 29-30). That is, the cited *Thiel Table* is used by the *Thiel* system to identify carriers that would provide a user-pre-selected delivery service and user-requested shipping features and to calculate shipping rates for shipping a parcel; the cited *Thiel Table* does not contain shipping rates for shipping a particular parcel as asserted in the Office Action.

In summary, in view of the above-described disclosures of *Thiel*, it is respectfully asserted that, as compared to the above-recited limitations of Claim 2, the *Thiel Table* is not *generated* by the *Thiel* system at all, and further is not a generated display, but rather is a stored table of base rate components used to calculate shipping rates.

Yet further, as compared to the above-recited limitations of Claim 2, for example, to "... generate a respective simultaneous cross-comparison display of

respective shipping rates for each delivery service offered by each carrier of the plurality of carriers that would ship the respective parcel ....", the *Thiel Table* does not contain shipping rates for a "... respective parcel ...", but rather stores shipment rating components, that are used by *Thiel* as input for determinations of shipping rates for delivering particular packages to particular destinations.

Moreover, it is respectfully asserted that "generat[ing] a ... simultaneous cross-comparison display of ... shipping rates ..." is completely absent from the references of record.

Rather, it is respectfully asserted that the description of the disparate features that "Nicholls and Kara, disclose the use of calculating and displaying rates for specific services, for multiple carriers, but fails to disclose the simultaneous display of rates for each carrier for each service ..." (*Office Action*, Topic No. 10, p. 4), and the assertion by the Office Action of obviousness of the combination with those references of the *Thiel* table (which is not a table of shipping rates generated for a shipping a particular parcel, but is merely a table of shipping rate calculation components), are evidence that the Office Action's conclusion of obviousness is *ex post* analysis of the present application as prohibited by *In re Mahurkar*.

For the reasons given above with respect to the limitations recited by independent Claim 1 on which Claim 2 depends, and with respect to the limitations recited by dependent Claim 2, it is respectfully asserted that Claim 2 is distinguished from the cited references and is in condition for allowance.

Claims 7, 9, 10 and 31

In rejecting independent Claims 7, 9 and 31, the Office Action stated that "... Nicholls fails to disclose that for each carrier determining whether the carrier would support the shipping of a particular parcel according to rules, and generating a simultaneous display of rates for multiple carriers for a delivery service. Kara discloses simultaneously displaying rates for multiple carriers for a selected delivery service (see Figure 8) and discloses the rates are disclosed for those carriers meeting the desired parameters (Column 22, lines 13-48)." *Office*

Action, Topic No. 14, p. 5. The Office Action then states that "Kara and Nicholls disclose generating an online display of at least one service of a plurality of carriers, however, fails to disclose the simultaneous display of the rates for each carrier for each service." *Office Action*, Topic No. 15, p. 6. The Office Action then asserts that "Intershipper is an internet, online website, where internet users can enter origin, destination, package weight and dimensions and will be displayed every method possible that you can use to ship your package for all major shippers (See Internet Update Article Page 1, Paragraphs 1-3)." *Office Action*, Topic No. 15, p. 6. The Office Action then further asserts that "[i]t would have been obvious to one having ordinary skill in the art at the time the invention was made to modify Nicholls and Kara to display every method possible to ship a package, as disclosed by InterShipper, in order to find the cheapest shipping rate (See Page 1). *Office Action*, Topic No. 15, p. 6.

The rejection of Claims 7, 9, and 31 has been carefully considered. Claims 7, 9 and 31 have been amended to more distinctly claim the claimed invention.

For the following reasons and authorities, Applicant(s) respectfully assert that the limitations claimed by Claims 7, 9, and 31, as amended, and therefore Claim 10 which is dependent on Claim 9, are nonobvious in view of the combination of *Kara* and/or *Nicholls* with the *Intershipper* reference.

Claim 7 as amended (and Claims 9 and 31 as similarly amended) claim:

> at least a third server computer device of the plurality of functionally aligned server computer devices that is programmed to use the respective data to calculate a first respective shipping rate for, and determine a first date and time by, which a first carrier would deliver the respective parcel via a first delivery service, to calculate a second respective shipping rate for, and determine a second date and time by, which a second carrier would deliver the respective parcel via a second delivery service, and to calculate a third respective shipping rate for, and determine a third date and time by, which the first carrier would deliver the respective parcel via a third delivery service; and
>
> at least one server computer device of the plurality of functionally aligned server computer devices that is programmed to simultaneously display the first respective shipping rate, the first date and time, the

> second respective shipping rate, the second date and time, the third respective shipping rate, and the third date and time, to a display device in communication with a respective client computer device used by the respective user to input the respective request.

It is respectfully asserted that the *Intershipper* reference does not disclose the above-recited combination of limitations, even when that reference is considered in combination with the other cited references. The February 18, 1998 *Newsbytes Intershipper Article* cited by the Office Action states "[s]imply enter your origin anywhere in the U.S. is OK, and destination, worldwide, along with your package weight and dimensions. The free service will return every method possible that you can use to ship your package and arrange the results in cost order, and color code the results by approximate transit time."

In particular, although the *Intershipper Newsbytes Article* mentions "approximate transit time," it is respectfully asserted that the *Intershipper Newsbytes Article* does not disclose as claimed by amended Claims 7, 9 and 31, dates and times by which a carrier would deliver the respective parcel.

Further, it is respectfully submitted that the February 18, 1998 *Newsbytes Intershipper Article* cited by the Office Action does not state, or otherwise disclose, that "... at least a third server computer device of the plurality of functionally aligned server computer devices ..." of the referenced *Intershipper* service is programmed to provide the limitations recited, for example, by Claim 7 of the present application, to:

> use the respective data to calculate a first respective shipping rate for, and determine a first date and time by, which a first carrier would deliver the respective parcel via a first delivery service, to calculate a second respective shipping rate for, and determine a second date and time by, which a second carrier would deliver the respective parcel via a second delivery service, and to calculate a third respective shipping rate for, and determine a third date and time by, which the first carrier would deliver the respective parcel via a third delivery service ...

Rather, it is respectfully asserted that in making its assertions of obviousness, the Office Action uses the present application as a roadmap to read into the February 18, 1998 *Newsbytes Intershipper Article* a presumption that the

statement "every method possible" necessarily discloses more than one service offered by any particular carrier. It is respectfully asserted that it does not. Rather, the February 18, 1998 *Newsbytes Intershipper Article* reference expressly states that "Internet users can now get shipping rates from all major shippers." It does not indicate that shipping rates would be available by the *Intershipper* service for all major shippers for all delivery services offered by those shippers.

Moreover, it is respectfully submitted that the February 18, 1998 *Newsbytes Intershipper Article* reference cited by the Office Action does not state, or otherwise disclose, that "... at least one server computer device of the plurality of functionally aligned server computer devices ..." of the referenced *Intershipper* service is programmed to perform any particular function. In particular, it is respectfully submitted that the February 18, 1998 *Newsbytes Intershipper* reference cited by the Office Action does not state, or otherwise disclose, that "... at least one server computer device of the plurality of functionally aligned server computer devices ..." of the referenced *Intershipper* service is programmed to provide the limitations recited, for example, by Claim 7 of the present application, to:

> simultaneously display the first respective shipping rate, the first date and time, the second respective shipping rate, the second date and time, the third respective shipping rate, and the third date and time, to a display device in communication with a respective client computer device used by the respective user to input the respective request.

Rather, it is respectfully asserted that in making its assertions of obviousness, the Office Action uses the present application as a roadmap to read into the February 18, 1998 *Newsbytes Intershipper Article* reference a presumption that the statement "[t]he free service will return every method possible" necessarily comprises a disclosure of simultaneous display. It is respectfully asserted that it does not.

In particular, it is respectfully submitted that "... decomposing an invention into its constituent elements, finding each element in the prior art, and then

claiming that it is easy to reassemble these elements into the invention, is a forbidden *ex post* analysis." *In re Mahurkar Patent Litigation*, 831 F. Supp. 1354, 1374-75, 28 U.S.P.Q.2d (BNA) 1801, 1817 (N.D. Ill. 1993), *aff'd*, 71 F.3d 1573, 37 U.S.P.Q.2d 1138 (Fed. Cir. 1995) (Opinion by Judge Easterbrook; "With hindsight the transistor is obvious; but devising the transistor was still a work of genius. An invention lies in a combination of elements that are themselves mundane. 'Virtually all inventions are combinations and virtually all are combinations of old elements.' ...(Citations omitted) ....").

It is respectfully asserted that none of the cited references, including *Intershipper*, disclose functional alignment of a plurality of server computer devices as claimed in one way or another by independent Claims 7, 9, and 31.

It is respectfully submitted that various non-limiting exemplary embodiments of the limitations recited by independent Claims 7, 9, and 31 are disclosed in the Specification as follows:

> The present invention provides a computer system for managing shipping of a plurality of parcels by a plurality of users using a plurality of carriers that functionally aligns each server computer device of a plurality of server computer devices so that each server computer device performs a plurality of activities in support of a primary function.

Specification, p. 2, lines 27-30.

In view of the direction by the *Interim Guidelines* to consider every limitation of a claim and to consider a claim as a whole, and in view of the holding in *In re Mahurkar* prohibiting *ex post* analysis, it is respectfully asserted that the simultaneous display of calculated shipping rates for multiple delivery services offered by multiple carriers as claimed by independent Claims 7, 9 and 31 is not disclosed by, or obvious in view of, the references of record.

Accordingly, it is respectfully asserted that amended independent Claims 7, 9 and 31, and therefore the Claims that are dependent on them (namely, Claim 10), are in condition for allowance.

CONCLUSION

For the reason given, and the references cited above, it is respectfully asserted that the invention disclosed and claimed in the present application is not fairly taught by any of the references of record, taken either alone or in combination, and that the application is in condition for allowance. Accordingly, reconsideration and allowance of the application is respectfully requested.

Respectfully submitted,
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